

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TOTAL PETROLEUM PUERTO RICO * Civil No. 10-1206 (ADC-JA)

Plaintiff, *

v. *

GODHER CORPORATION. *

Defendant. *

MOTION IN COMPLIANCE WITH COURT ORDER DATED APRIL 5, 2011

TO THE HONORABLE COURT:

NOW COMES defendant, Godher Corporation (“Godher”), through its undersigned attorney and respectfully states, alleges and prays as follows:

1. On April 5, 2011, this Honorable Court issued an order which in its pertinent part reads as follows: “[d]efendant is to further report status of Bankruptcy proceedings on or before 6/24/2011.” (*See Docket Document # 28.*)

2. On November 4, 2010, Enrique S. Lamoutte Inclan, the judge in the bankruptcy proceeding, authorized the payment of the Trustee’s bond in order to keep the case open for potential asset recovery. (*See Docket Documents # 33 and 34, Godher Corp, Bankruptcy No. 10-02149-ESL7.*)

3. Hitherto, the status remains the same as in March 24, 2011, case remains open for possible asset recovery. (*See Docket Document # 27.*)

4. Therefore, the protection of Section 362 (Automatic Stay) continues **in full effect**
as to all creditors.

WHEREFORE Godher respectfully requests that the Honorable Court: (1) Take notice of the above; (2) Find the appearing party in compliance with its order dated April 5, 2011; and (3) Take any other appropriate measure provided by law.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of June of 2011.

CERTIFICATION OF SERVICE

I HEREBY CERTIFY THAT on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which electronically mails notice to the attorneys of record.

LAW OFFICE OF ENRIQUE A. BAEZ
559 Cuevillas St., Apt. 3-C
San Juan, P.R. 00907
Mobile: (787) 548-1096
E-mail: baez_law@yahoo.com

By: s/Enrique A. Baez
Enrique A. Baez
USDC-PR No. 214909